

## FEDERAL ELECTION COMMISSION Washington, DC 20463

TO:

The Commission

FROM: Lisa J. Stevenson

**Acting General Counsel** 

BY:

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SUBJECT:

MUR 7248 (Cancer Treatment Centers of America, et al.)

Pre-Probable Cause Conciliation

## I. INTRODUCTION

On May 9, 2017, the Commission found reason to believe that Cancer Treatment Centers of America Global, Inc. ("CTCA") and the Regional Medical Centers, violated 52 U.S.C. §§ 30118 and 30122 by making prohibited corporate contributions in the name of another person based on a sua sponte submission by CTCA. The Commission also found reason to believe that CTCA executives Stephen Bonner and Robert Mayo violated 52 U.S.C. §§ 30118 and 30122 by knowingly assisting others in making contributions in the name of another person and consenting to the making of prohibited corporate contributions; and that CTCA Chairman Richard Stephenson violated 52 U.S.C. § 30118 by consenting to prohibited corporate contributions. On May 24, 2017, the Commission authorized the Office of the General Counsel to settle the violations through pre-probable cause conciliation and approved a single joint conciliation agreement for all four respondents. Attached is a revised agreement negotiated with the respondents which would resolve the violations. For the reasons set forth below, we believe the

Eastern Regional Medical Center, Inc., Midwestern Regional Medical Center, Inc., Southeastern Regional Medical Center, Inc., Southwestern Regional Medical Center, Inc., and Western Regional Medical Center, Inc.

<sup>&</sup>lt;sup>2</sup> Certification, MUR 7248 (formerly P-MUR 581) (Cancer Treatment Centers of America Global, Inc., et al.) (May 9, 2017) (amended).

<sup>&</sup>lt;sup>3</sup> Certification, MUR 7248 (May 24, 2017); see Memorandum to the Commission, MUR 7248 (May 16, 2017).

attached agreement represents a reasonable settlement under the circumstances presented in this matter, and we recommend that the Commission accept the signed agreement.

Further, the First General Counsel's Report recommended in its analysis that the Commission find no reason to believe Stephenson violated 52 U.S.C. § 30122,<sup>4</sup> and the Commission approved a Factual and Legal Analysis that included this finding.<sup>5</sup> Due to an administrative error, however, that finding was not included in the list of recommendations at the end of the First General Counsel's Report<sup>6</sup> and the finding was excluded from the certification of findings. In order to remedy this discrepancy we recommend in this memo that the Commission find no reason to believe Stephenson violated 52 U.S.C. § 30122.

See First Gen. Counsel's Rpt. at 20-21, P-MUR 581.

Factual and Legal Analysis at 20-21, MUR 7248 (formerly P-MUR 581) (May 31, 2017).

Id. at 28-29.

Certification, MUR 7248 (formerly P-MUR 581) (Cancer Treatment Centers of America Global, Inc., et al.) (May 9, 2017) (amended).

## III. RECOMMENDATIONS

- 1. Find no reason to believe that Richard Stephenson violated 52 U.S.C. § 30122.
- 2. Accept the attached signed joint conciliation agreement with Cancer Treatment Centers of America Global, Inc., the Regional Medical Centers, Stephen Bonner, Robert Mayo, and Richard Stephenson.
- 3. Approve the appropriate letters.
- 4. Close the file.